



Charlton Environmental Conservation Commission

Alan Grattidge, Supervisor
Town of Charlton
Charlton Town Hall
758 Charlton Road
Charlton, N.Y. 12019

October 31, 2019

Subject: ECC Review of Revised Verizon Application for Exceptional Use Permit dated 9-19-19

The Charlton Environmental Conservation Commission (ECC) reviewed the subject application at its October 29, 2019 meeting. Comments and questions were discussed with Dave Brennan, Verizon's Attorney, who attended the meeting, to answer any questions that we might have.

While there are some errors and deficiencies in the application in the Environmental Impact Assessment (EIA), there appear to be no significant adverse environmental impacts from the proposed action. Items discussed to address the ECC comments were as follows:

- There is an unlabeled wetland area near the site. Mr. Brennan said that the state (DEC) will officially locate and label the area if it meets the size and other requirements to be labeled an official wetland. In any case, Verizon will not disrupt the area and security can/will be provided by local police (state, county)
- The application refers to an emergency backup diesel generator on page 2, section III, but while it is mentioned in the text, it is generally ignored in the EIA. Although emergency backup units are essentially exempt from emission regulation, it will be tested weekly or bi-weekly, thereby creating air emissions, odors and noise and will require storage of fuel on site. None of this is acknowledged in the EIA. For example, in the Full EIA, Tab 1, page 6 of 13, item f. asks if one or more sources of air emissions are included on site, including fuel combustion and the answer given is No. If yes, additional information would be required. Similarly on page 8 of 13, item o. asks about odors and item p. asks if there will be bulk storage (1100 gallons or more) of petroleum on site. This is consistent throughout the EIA. The size of the power unit is small (30 KW) and its emissions may be de minimis, as is the case with bulk storage of fuel, but they should be acknowledged. Mr. Brennan agreed that this should be changed
- Page 12 of 13, item E.3.a., asks if the site is in a designated Agricultural District. Parts of Charlton are near or possibly in an Ag District. Mr. Brennan said that had been checked and the site is not in an Ag District.
- Any work on an existing road or a new road will have the proper permits. The existing road has been there for a long time.
- Visibility could be an issue. There could be some small view of the tower from roadways, but the color could be modified to hide visual impacts
- If and when the facility becomes obsolete the structure will be removed by Verizon. A removal bond will be provided to the Town by Verizon.

If we can be of further help please contact me at mschorr1@nycap.rr.com, or at 518-399-4161.

Marvin M. Schorr, Chairman
Charlton Environmental Conservation Commission